

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JACLYN LYNETTE PENDLETON, Debtor Case No. 18-02002-NPO  
CHAPTER 13**

**MOTION TO INCUR NEW DEBT**

COMES NOW, Debtor, by and through counsel, and moves this Court to allow Debtor to incur new debt, and in support thereof, would show the Court as follows:

1.

Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on May 18, 2018.

2.

Debtor's vehicle is no longer drivable. Debtor is in need of reliable transportation.

3.

Debtor is paying approximately \$2,957.92 to General Unsecured Debts through the plan.

4.

Debtor wishes to borrow \$18,000.00 to purchase a vehicle with an interest rate not to exceed 20.00%, term no greater than 60 months and payment no more than \$450.00 per month. Debtor will pay this debt to the lender direct pursuant to the terms of the agreement with the lender.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MS Bar No. 103469)  
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**CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the foregoing was forwarded on January 8, 2020, to the creditor, case trustee and U.S. Trustee as indicated in the "21 day notice" that accompanies this Motion.

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.